

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

HEWLETT-PACKARD COMPANY,
and HEWLETT-PACKARD
DEVELOPMENT COMPANY, L.P.

Plaintiffs

v.

ICL NETWORK SOLUTIONS
(HK) LIMITED and
C2C TECHNOLOGY, INC.,

Defendants.

Civil Action No.: 05-40153-(FDS)

MOTION FOR LEAVE TO FILE UNDER SEAL A
MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO WITHDRAW

Lowrie, Lando & Anastasi, LLP (hereinafter "LL&A") hereby moves for leave to file, under seal, a Memorandum in Support of its Motion For Leave to Withdraw from Representation.

As grounds for this Motion, LL&A states that the Memorandum makes reference to information, and includes as exhibits, documents that the Defendant, ICL Network Solutions (HK) Ltd., may consider confidential and/or subject to the attorney-client privilege. It is essential that the Court have access to this information and these materials in order to understand the issues before it.

In order to expediently present the Motion to Withdraw from Representation to the Court with the opportunity for consideration at the Scheduling Conference about to be held on April

14, 2006, the Memorandum and exhibits are submitted on even date herewith in a sealed envelope.

WHEREFORE, LL&A hereby requests that its Motion For Leave to File a Memorandum Under Seal be ALLOWED.

Rule 7.1 Certification:

LL&A conferred with counsel for Plaintiffs on April 12th in a good faith effort to narrow or resolve the issues raised in this motion, and Plaintiffs' counsel was unable to assent to or oppose the motion, pending receipt of client instructions.

Respectfully submitted,

/s/ Ann Lamport Hammitte

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Date: April 13, 2006

Certificate of Service

I hereby certify that this document (but not including the memorandum and exhibits), as filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on the 13th day of April, 2006.

/s/ Ann Lamport Hammitte